

REMARKS

The Office Action mailed May 7, 2004 has been reviewed and the comments of the Patent and Trademark Office have been considered. Claims 1-9 were pending in the application. Claims 1-3, 8, and 9 have been amended and no claims have been canceled or newly added. Therefore, claims 1-9 are pending in the application.

This amendment changes claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier.

It should be noted that claim 3 has been amended only to improve its readability and not to narrow its scope in any way.

In the Office Action, claims 1-4 and 6-9 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. patent 6,718,368 to Ayyadurai (hereafter "Ayyadurai") in view of U.S. Patent Publication Application 2003/0208434 to Posner (hereafter "Posner"), in further view of Microsoft® Outlook 2000 (hereafter "Outlook"). Applicant respectfully traverses this rejection for at least the following reasons.

Each of the independent claims 1, 8, and 9 recite a method (or system/software) that is used in e-commerce to maximize the automation of a reply to an inbound document from a particular trading partner. Accordingly, each of the independent claims recite that the candidate reply transaction *documents* are determined associated with not only (1) the inbound document but also (2) the particular trading partner that is the sender of that inbound document. As further recited in claim 2, the method includes looking up a database that indexed, *inter alia*, by the trading partners that send the inbound documents so that the most appropriate candidate reply documents can be identified for a particular inbound document and a particular trading partner. That is, the claimed invention provides that the most appropriate candidate reply documents are determined based on both the inbound document itself and the particular trading partner that sent that inbound document. At least this recited feature is not disclosed or suggested by the applied prior art.

Specifically, Ayyadurai relates to a process for composing an appropriate reply based on candidate *phrases* selected based on the input of a filter and modeler 30 in Fig. 3 of Ayyadurai. However, this filter and modeler 30 performs language analysis and

characterizations of the content of the text message based on the content of the message itself. See, for example, col. 5, lines 55-65 of Ayyadurai. In fact, Ayyadurai teaches that characteristics of the customer (the sender of the message) such as his attitude or education level are estimated based on the analysis of the contents of the message itself. Therefore, Ayyadurai does not teach the claimed feature that the optional reply *documents* be determined based on the inbound document *and* the particular trading partner that sent the inbound document. In fact, Ayyadurai teaches away from such a feature.

Furthermore, these deficiencies in Ayyadurai are not cured by any of the other applied references. Accordingly, the office action fails to make a *prima facie* case of obviousness with respect to the pending independent claims.

Specifically, the cited portion of Posner relates to a template manager module which populates a purchase order with information from an RFP section and a negotiation module. It does not teach or suggest the claimed feature that the candidate reply transaction *documents* are determined associated with not only (1) the inbound document but also (2) the particular trading partner that is the sender of that inbound document. Accordingly, the pending independent claims are patentable over the applied prior art.

The dependent claims are also patentable for at least the same reasons as the independent claims on which they ultimately depend. In addition, they recite additional reasons for their patentability when considered as a whole.

For example, as discussed earlier, claim 2 recites a database that is indexed based on trading partners so that candidate reply documents can be based on combinations of particular trading partners and inbound documents. This recited feature is also not disclosed or suggested by the applied prior art and provides an additional reason for the patentability of this claim.

In view of the above, applicant believes that the present application is now in condition for allowance. An early notice of the same is respectfully solicited. The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

Should additional fees be necessary in connection with the filing of this paper, or if a petition for extension of time is required for timely acceptance of same, the Commissioner is hereby authorized to charge deposit account No. 19-0741 for any such fees; and applicant hereby petitions for any needed extension of time.

Respectfully submitted,

Date August 9, 2004 (Monday)

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